

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RC,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A",

Defendants.

Case No. 25-cv-04530

Judge John Robert Blakey
Magistrate Judge M. David Weisman

PLAINTIFF’S MOTION TO EXTEND TEMPORARY RESTRAINING ORDER

Plaintiff RC (“Plaintiff”) respectfully requests extension of the Temporary Restraining Order (“TRO”) [23], currently in force in this matter pursuant to the Court’s discretion under Fed. R. Civ. P. 65(b)(2). In support of the motion, Plaintiff states:

1. On June 12, 2025, the court granted Plaintiff’s motion for an *ex parte* TRO [22] and entered a sealed TRO [23]. The TRO expires on June 26, 2025.

2. On June 13, 2025, Plaintiff served the sealed order, Amended Complaint, and subpoena on Amazon, eBay, Shein, Walmart and PayPal via email. On June 17, 2025, Plaintiff served the sealed order, Amended Complaint, and subpoena on Alibaba and Aliexpress via email. The TRO and Plaintiff’s email communication requested that the addressed sites: (1) freeze the assets in the accounts of any Defendant identified on Schedule “A” of the Complaint, and (2) provide Plaintiff information regarding the named Defendants, specifically, their email addresses, other contact information, the amounts frozen in each Defendant’s account, and the number of sales of infringing goods.

3. As of the filing of this motion, Shein and Walmart have responded to the TRO and produced some or all the requested information. Paypal has responded to the TRO and advised Plaintiff that it could not locate any accounts registered to the named defendants. As of the filing of this motion, Alibaba, Aliexpress, Amazon, eBay, LianLian, Payoneer, and Stripe have not responded or otherwise produced the requested documents and information.

4. Defendants will be served with the Summons, sealed Complaint, and sealed TRO as the platforms and processors produce information to Plaintiff.

5. Until Plaintiff receives notice from the platforms that the asset freeze ordered by the Court has taken place and they have provided complete identifying information regarding the Defendants so that the Plaintiff can serve them, the same circumstances that necessitated entry of the TRO continue to apply.

6. This Court has the power and discretion to “for good cause, extend the TRO for a like time,” which, in this instance, is an additional fourteen (14) days. Fed. R. Civ. P. 65(b)(2).

7. Plaintiff submits that good cause exists to extend the TRO to and including July 10, 2025. Plaintiff has not yet received complete information from the e-commerce platform and therefore has been unable to serve the Summons, Complaint, and TRO upon Defendants. Once the Defendants have been served, Plaintiff will move the Court to enter a preliminary injunction and unseal all documents sealed by the Court’s order [23].

WHEREFORE, Plaintiff respectfully requests that this Court enter an order extending the current TRO for an additional fourteen (14) days, to and including July 10, 2025.

Dated: June 20, 2025

Respectfully submitted,

/s/ James E. Judge

Zareefa B. Flener (IL Bar No. 6281397)
James E. Judge (IL Bar No. 6243206)
Ying Chen (IL Bar No. (IL Bar No. 6346961)
Flener IP Law, LLC
77 West Washington Street, Suite 800
Chicago, Illinois 60602
(312) 724-8874
litigation@fleneriplaw.com